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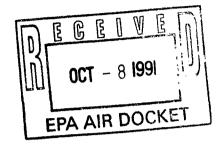


PENNZOIL PLACE • P. O. BOX 2967 • HOUSTON, TEXAS 77252-2967 • (713) 546-8643

October 4, 1991

R. G. TRIPP Vice President Planning and Technical Manufacturing Division

Central Docket Section A-90-16 Air Docket (LE131) U. S. Environmental Protection Agency Room M-1500 Washington, D.C. 20460



Dear Sirs:

Pennzoil recommends approval of Ethyl Corporation's fuel additive waiver petition to allow use of MMT, the manganese-based anti-knock and octane booster.

In general, we support the development and use of octane improver additives for gasoline blending provided they are cost effective, proven safe to use, and are consistent with the national objective of improving air quality through reduced emissions. Since Ethyl's MMT additive has apparently met these criteria, it is in the best interest of Pennzoil, the industry, and the national economy to support its use.

Sincerely,

Robert G. Tripp

RGT:sd:T292

cc: Director

Field Operations & Support Division (EN-397F)

EPA

Washington, D.C. 20460